

EXHIBIT C

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

SHERYL MILLER,

Plaintiff,

v.

Civil Action No.

WILLIAM BEAUMONT HOSPITAL dba

3:21-cv-12259

BEAUMONT HEALTH SYSTEM,

Defendant.

VIDEOCONFERENCE DEPOSITION OF
SHAUNA WILLETTE

DATE: Tuesday, April 11, 2023

TIME: 9:05 a.m.

LOCATION: Remote Proceeding

Sault Saint Marie, MI 49783

REPORTED BY: Priscilla Gibbs, Notary Public

JOB NO.: 5866431

A P P E A R A N C E S

ON BEHALF OF PLAINTIFF SHERYL MILLER:

AUSTEN J. SHEAROUSE, ESQUIRE (by videoconference)

Carla D Aikens, P.L.C.

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ON BEHALF OF DEFENDANT WILLIAM BEAUMONT HOSPITAL dba
BEAUMONT HEALTH SYSTEM:

ELYSE K. CULBERSON, ESQUIRE (by videoconference)

Jackson Lewis PC

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Southfield, MI 48075-1146

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(248)936-1900

ALSO PRESENT:

Jennifer Zinn, In-House Counsel (by
videoconference)

Roseanna Von Linsowe, Corporate Representative
for Beaumont (by videoconference)

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I N D E X

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E X H I B I T S

NO.	DESCRIPTION	PAGE
	(None marked.)	

P R O C E E D I N G S

THE REPORTER: Good morning. My name is Priscilla Gibbs; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 9:05 a.m.

This is the deposition of Shauna Willette taken in the matter of Sheryl Miller vs. William Beaumont Hospital doing business as Beaumont Health Systems on Tuesday, April 11, 2023, via Zoom.

I am a notary authorized to take acknowledgments and administer oaths in Michigan. Parties agree that I will swear in the witness remotely.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and
- shall constitute written stipulation of such.

1 At this time will everyone in
2 attendance please identify yourself for the record.

3 MR. SHEAROUSE: Austen Shearouse on
4 behalf of the plaintiff.

5 MS. CULBERSON: Elyse Culberson on
6 behalf of the defendant. And also with me today is
7 Jennifer Zinn who is defendant's in-house counsel as
8 well as Roseanna Von Linsowe who is the corporate
9 representative for defendant.

10 MS. WILLETTE: Shauna Willette,
11 witness.

12 THE REPORTER: Thank you. Hearing no
13 objections, I will now swear in the witness. Please
14 raise your right hand to be sworn.

15 WHEREUPON,

16 SHAUNA WILLETTE,
17 called as a witness, and having been first duly sworn
18 to tell the truth, the whole truth, and nothing but
19 the truth, was examined and testified as follows:

20 THE REPORTER: Thank you.

21 EXAMINATION

22 BY MR. SHEAROUSE:

23 Q Good morning. My name is Austen Shearouse,
24 and I represent Sheryl Miller in this cause of action.
25 Just a couple quick questions before we get started.

1 Have you ever had your deposition taken before?

2 A No.

3 Q Okay. So just a couple more things to add
4 on to what the court reporter kind of went over,
5 especially with it being Zoom. Make sure to give a
6 couple of seconds after myself or Elyse asks a
7 question. That way we ensure that the digital lag
8 doesn't override each other with your answer. And I'm
9 going to try to do the same with your answer. I know
10 we will probably end up cutting one another off at
11 some point, but I'm going to do our best.

12 Make sure that any answer you give is
13 verbal. So I know sometimes we have a tendency to nod
14 our head or be expressive with our hands and point or
15 use, "mm-hmms," like nonverbal answers. So just make
16 sure everything is verbal. It makes it easier for the
17 court reporter.

18 If at any point in time you need to take a
19 break for any reason, I'm happy to do that. This is
20 not a sprint. It's not an endurance test. So if you
21 need a break, all I ask is that if myself or Elyse has
22 posed a question, you answer that question and then we
23 can take that break. Does that sound fair?

24 A Yes. Thank you.

25 Q And the last thing is if at any point in

1 time you don't understand any question I ask, please
2 ask me to rephrase or restate it. But if you answer a
3 question, I'm going to assume that you understood what
4 I asked. And obviously, I only want to know what you
5 what you, yourself, can remember or attest to. So if
6 you can't remember, "I don't know" is a completely
7 acceptable answer.

8 A Thank you.

9 Q Okay. Can you state your full name for the
10 record, please?

11 A Shauna Suzanne Willette.

12 Q And what is your date of birth?

13 A 9/29/67.

14 Q And are you currently employed?

15 A Yes.

16 Q Where are you employed at?

17 A MyMichigan Health. And Community Health
18 Services.

19 Q And what is your current address?

20 A 314 Maple Street, Apartment 4, Sault Saint
21 Marie, Michigan 49783.

22 Q And you said that you're working at
23 MyMichigan Health and Community Health Services. Are
24 those two separate organizations?

25 A Yes. They are.

1 Q What is your role at MyMichigan Health?

2 A Insurance verification specialist.

3 Q And what about at Community Health Services?

4 A Same title, insurance verification
5 specialist.

6 Q And what are the responsibilities of an
7 insurance verification specialist?

8 A Verify insurance for inpatient and
9 outpatient services for patients for the hospitals.

10 Q Okay. And when did you start in these
11 roles?

12 A September 1st of 2021 for MyMichigan Health.
13 And August 8th of 2022 for Community Health Services.

14 Q So prior to these jobs were you employed?

15 A Yes.

16 Q Where were you working at prior to these
17 jobs?

18 A For -- it's called a -- it's a company
19 called R1 RCM. It's a revenue cycle company that does
20 the revenue cycle for Ascension Health in the Detroit
21 area.

22 Q And do you know when you started in that
23 role?

24 A July of 2020.

25 Q And when did you stop working in that role?

1 A September of 2021.

2 Q And then prior to the RCM revenue position,
3 where did you work?

4 A That's when I worked for Beaumont Trenton.

5 Q And when did you start with Beaumont
6 Trenton?

7 A January of 2020.

8 Q And when was the last day you worked for
9 Beaumont Trenton?

10 A Sometime in July of 2020.

11 Q And during that roughly six to seven month
12 tenure, what was your position with Beaumont?

13 A Patient access supervisor.

14 Q And can you describe a little bit about what
15 the role of a patient access supervisor is?

16 A We supervise the registration department for
17 the emergency room and any outpatient services on the
18 Breast Care Center, did their schedules, carried the
19 pagers for if they called in or if there were any
20 issues. We alternated every other week, worked any
21 denials, helped with any issues, worked with the
22 Union.

23 Q And was there a particular reason that you
24 left Beaumont in July of 2020?

25 A COVID hit, and I did not see a future at

1 Beaumont.

2 Q Was there any reason why you didn't see a
3 future at Beaumont?

4 A I didn't think that at the time there would
5 be a need for two supervisors. One could have handled
6 it. And I did not care for my position.

7 Q And when you say you did not care for your
8 position, could you elaborate on that a little bit?

9 A It was a toxic position.

10 Q What was --

11 A I did not get along with the other
12 supervisor. Our personality clashed.

13 Q Who was the other supervisor?

14 A Roseanna.

15 Q And when you say it was a toxic environment,
16 what are some -- give me some examples of what made it
17 toxic.

18 A I was just not -- I didn't feel that I was
19 included on the decision making. I was told from the
20 get go that being the newbie, I should sit back and
21 watch and not really make any decisions. And it just
22 -- there was a few occasions where we just -- we just
23 -- our personalities clashed.

24 Q Did you ever have any arguments with
25 Roseanna?

1 A Yes.

2 Q What were those arguments concerning?

3 A I don't recall. There was a few of them,
4 and I just -- I don't recall.

5 Q Okay. But you had at least more than one
6 argument with Roseanna at that time?

7 A Yes.

8 Q Did you ever witness Roseanna having
9 arguments with anyone else?

10 A I don't recall.

11 Q Did anyone ever come and complain to you
12 about Roseanna during your time at Beaumont?

13 A I'm sure they did, but I don't recall
14 specifics.

15 Q Okay. And so that was one of the reasons
16 that led to you leaving Beaumont in July of 2020?

17 A Yes.

18 Q Okay. And you said that during your tenure,
19 you were the supervisor for the Breast Care Center; is
20 that correct?

21 A It was part of our responsibilities, yes.
22 Just the registration person up there.

23 Q And during your time there, do you know who
24 was the registration person in January of 2020 for the
25 Breast Care Center?

1 A So Sheryl was up there when I got there, but
2 then COVID hit and the breast center closed, so nobody
3 was up there.

4 Q Do you know if the Breast Care Center was
5 ever reopened?

6 A I'm sure it did. I can't recall specifics.
7 I'm sure it did before I left, but it was a very short
8 window, I would have to say.

9 Q Do you remember if Sheryl resumed working at
10 the Breast Care Center when it reopened?

11 A She was still off on a medical leave, I do
12 believe. So I don't believe she did. She was out on
13 medical.

14 Q Were you still working at Beaumont when
15 Ms. Miller returned from medical leave?

16 A I don't remember her coming back. I think
17 when she came back, it was right around the time I was
18 on my way out.

19 Q Okay. And then around March of 2020 was
20 when the COVID pandemic kind of went into full swing,
21 correct?

22 A Yes.

23 Q And did that have an effect on the operation
24 of the Breast Care Center and the other areas that you
25 managed?

1 A Yes. I mean, the Breast Care Center, I mean
2 it -- they weren't doing outpatient, so it shut down.
3 Surgery center shut down.

4 Q And with COVID, were employees required to
5 wear the -- involved in registration required to wear
6 additional safety protection?

7 A They did have masks, yes.

8 Q Was Beaumont supplying those masks?

9 A Yes.

10 Q And so when you say masks, was Beaumont
11 supplying N95 mask or surgical?

12 A Surgical masks.

13 Q Was there a particular reason why N95s
14 weren't being supplied?

15 A PPE shortage.

16 Q And so Beaumont needed to reserve those
17 masks for nurses and doctors?

18 A Yes.

19 Q Was there anything in a Beaumont policy that
20 stated someone couldn't bring their own N95 masks from
21 home and use them?

22 A Not that I recall.

23 Q Do you recall any meeting stating something
24 to that similar effect?

25 A No, I don't recall.

1 Q So as you sit here today, your understanding
2 would be that if someone had their own supply during
3 that time of N95 masks, they could have brought and
4 used them?

5 A I would imagine so. I would not have
6 stopped them.

7 Q And you stated earlier that some other
8 employees might have complained to you about
9 Roseanne's behavior, but you can't really recall any
10 specifics?

11 A Exactly, yes.

12 MR. SHEAROUSE: Okay. I don't think I
13 have anything further at this time. Elyse, if you
14 have follow ups?

15 MS. CULBERSON: Can I just take a quick
16 five?

17 MR. SHEAROUSE: Yeah. For sure.

18 MS. CULBERSON: Okay. Thanks. We'll
19 be back at 9:25.

20 MR. SHEAROUSE: All right.

21 THE REPORTER: We're off the record at
22 9:20 a.m. for a break.

23 (Off the record.)

24 THE REPORTER: We're back on the
25 record. It is now 9:26 a.m.

1 MS. CULBERSON: Okay. For the record,
2 I have no questions.

3 MR. SHEAROUSE: Nothing further. Thank
4 you for your time, Shauna.

5 THE WITNESS: Thank you.

6 MS. CULBERSON: Thanks, Shauna. Have a
7 good one.

8 THE WITNESS: You, too.

9 THE REPORTER: Do we have any orders
10 for this witness?

11 MS. CULBERSON: Okay. We have the same
12 link for the whole day, right?

13 MR. SHEAROUSE: Yes. It's the same
14 link for the whole day.

15 MS. CULBERSON: Perfect.

16 THE REPORTER: Do we have any orders
17 for this witness?

18 MS. CULBERSON: Oh, we can't hear you.
19 I'm sorry. I'll take a transcript as well.

20 THE REPORTER: A transcript?

21 MS. CULBERSON: Yes. E-trans is fine.

22 THE REPORTER: E-trans. Thanks, Elyse.
23 Anyone else?

24 MR. SHEAROUSE: Yeah. Just e-trans for
25 plaintiff as well, and that'll be all.

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1 THE REPORTER: All right.

2 MR. SHEAROUSE: We'll see you guys in
3 about an hour.

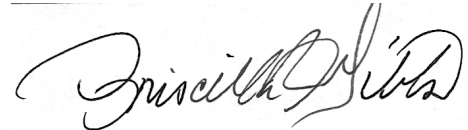
4 THE REPORTER: Thank you. We're off
5 the record, 9:27 a.m.

6 (Whereupon, at 9:27 a.m., the
7 proceeding was concluded.)
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CERTIFICATE OF DEPOSITION OFFICER

I, PRISCILLA GIBBS, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

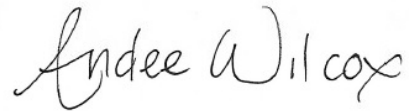


PRISCILLA GIBBS

Notary Public in and for the
State of Michigan

CERTIFICATE OF TRANSCRIBER

I, ANDEE WILCOX, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



ANDEE WILCOX

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[reporter - time]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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